

Exhibit 1

Email By S. Ohri Presenting Plaintiff's Proposed  
Change To Defendants' Proposed Order

Timothy P. O'Connor

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**From:** Shubra Ohri [sohri@peopleslawoffice.com]  
**Sent:** Wednesday, November 29, 2017 6:15 PM  
**To:** Timothy P. O'Connor  
**Cc:** Flint Taylor; bradjaythomson@gmail.com  
**Subject:** Smith v. City of Chicago et al, 17-cv-04902: Protective Order  
**Attachments:** Fuentes - Protective Order.pdf; Wade\_Doc103\_Protective\_Order\_170315.pdf

Tim,

In regards to your proposed protective order, Plaintiff would only agree to it with the below revision:

Replace paragraph 2(b) in its entirety with

“Two copies of CR files will be produced simultaneously, a clean copy for attorney’s eyes only, and a redacted copy that may be disseminated to the public.”

As you know, Illinois law does not allow for blanket confidentiality of CR files. *Kalven v, City of Chicago*, 2014 IL App (1st) 121846. And the protective order you propose seeks to do just that by requiring a burdensome “public release” procedure. Please see attached for recent confidentiality orders that adopt language similar, if not identical language to what Plaintiff proposes above.

Thanks,

Shubra

Shubra Ohri  
Staff Attorney  
People’s Law Office  
1180 N. Milwaukee Ave  
Chicago, Illinois 60642



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